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26 [Counsel continued on next page]

27 **UNITED STATES DISTRICT COURT**
28 **CENTRAL DISTRICT OF CALIFORNIA**
29 **WESTERN DIVISION – LOS ANGELES**

30 Frankel, et al.,

31 Plaintiffs,

32 v.

33 Regents of the University of
34 California, et al.,

35 Defendants.

36 Case No. 2:24-CV-4702-MCS

37 **DECLARATION OF MONROE**
38 **GORDEN, JR. IN SUPPORT OF**
39 **DEFENDANTS' OPPOSITION TO**
40 **PLAINTIFFS' MOTION FOR**
41 **PRELIMINARY INJUNCTION**

42 Judge: Hon. Mark C. Scarsi
43 Courtroom: 7C
44 Hearing: July 29, 2024, 9:00 AM PT

1 [Counsel continued from previous page]

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11 *Attorneys for Defendants*

12 **Notice of Appearance forthcoming*

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1 I, MONROE GORDEN, JR. declare as follows:

2 1. This declaration is submitted in support of Defendants' Opposition to
3 Plaintiffs' Motion for Preliminary Injunction.

4 2. I am Vice Chancellor for Student Affairs at the University of
5 California, Los Angeles ("UCLA"). I have worked at UCLA for over fifteen years
6 and have taken on several roles during my time, including working as the Assistant
7 and Associate Vice Chancellor of Student Affairs. My current role spans the entire
8 range of student needs and interests from early outreach through graduation,
9 housing, physical and emotional wellness, recreation, and student organizations.
10 I have personal knowledge of the matters stated herein and, if called upon, I could
11 and would competently testify hereto.

12 3. Student Affairs staff known as Student Affairs Mitigators/Monitors
13 ("SAMs") have been present during protest events on campus since October 7,
14 2023. SAMs are present to support our students.

15 4. Prior to the Royce Quad encampment, members of UCLA's senior
16 leadership, including me, discussed strategies for addressing a potential
17 encampment on campus, given the appearance of encampments on other campuses
18 around the country. I and other members of UCLA's senior leadership participated
19 in regular meetings to develop strategies to the extent an encampment formed at
20 UCLA.

21 5. During the Royce Quad encampment, SAMs were present to escort
22 any students to their classes and around campus who felt unsafe.

23 6. I never directed any Student Affairs staff to exclude any student from
24 the Royce Quad encampment or to "screen" students based on their viewpoint or
25 their faith. Nor am I aware of any Student Affairs staff preventing any student from
26 entering the Royce Quad encampment. However, senior leadership, including
27 myself, recognized that the situation around the perimeter of the encampment was
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1 unstable and needed to end.

2 7. On the afternoon of April 30, 2024, the individuals in the encampment
3 were given formal, written notice by my staff that the encampment was unlawful
4 and would be disbanded if the individuals did not disperse.

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 8th day of July, 2024, at Los Angeles,
3 California.

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5 Dated: July 8, 2024

Respectfully submitted,

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7 By:


MONROE GORDEN, JR.

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